

## United States District Court

for the

Southern District of Texas

UNITED STATES OF AMERICA )

V. )

CRAFT, Cierra Cachet ) Case Number:

Houston, TX. )

)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 29, 2018 in the county of Webb in the  
 (Date)  
Southern District of Texas, the defendant(s) violated:

*Code Section**Offense Description*Title 8 United States Code, Section  
1324

A United States Citizen did unlawfully transport Brazilian nationals Tiago PEREIRA-Silva, Washington NUNES-Andrade Filho, and eight (8) other undocumented aliens by means of motor vehicle within the Southern District of Texas, knowing or in reckless disregard of the fact that said aliens had come to, entered, or remained in the United States in violation of law, and transported or moved or attempted to transport or move said aliens within the United States by means of transportation or otherwise in furtherance of such violation of law.  
 The defendant conspired to transport the aforementioned aliens.

This criminal complaint is based on these facts:

See attachment "A".



Continued on the attached sheet.

/s/ Bernardo Trad

Complainant's Signature

**Bernardo Trad, HSI Task Force Officer**

Printed Name and Title

Sworn to before me and signed in my presence,

Date: July 2, 2018

Judge's Signature

City and State: Laredo, Texas**Diana Song Quiroga, U.S. Magistrate Judge**

Printed Name and Title

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**[CONT OF BASIS OF COMPLAINT]**

On June 29, 2018, at approximately 6:30 A.M., United States Border Patrol Agents (BPAs) assigned to the Laredo North Border Patrol Checkpoint located on Interstate Highway (IH) 35 North, approximately 29 miles north of Laredo, Texas, encountered Cierra Cachet CRAFT, a United States Citizen, at the primary tractor-trailer immigration inspection lane. CRAFT approached the immigration checkpoint driving a white, tractor-trailer combination.

While conducting an immigration inspection of CRAFT, the BPA noticed the curtains separating the driver'ss and sleeper area of the cabin were closed. The BPA then asked CRAFT if there was anybody else inside the sleeper area, and she replied there was not. The BPA asked CRAFT if she could open the curtain, which she consented and slid the curtain open. At that point the BPA noticed several blankets throughout the cabin, in what seemed an attempt to conceal something. The BPA called for a BPA and his service canine to his lane, and as the BPA canine team arrived, a non-intrusive free air sniff of the tractor was conducted which resulted in an alert to concealed humans and/or narcotics in the sleeper area of the tractor. CRAFT was then asked to step down from the tractor to allow the BPA to check the sleeper area. A search of the sleeper area revealed ten (10) undocumented aliens (UDAs) attempting to conceal themselves underneath the blankets. CRAFT and the ten (10) UDAs were escorted into the Border Patrol Checkpoint for processing.

Homeland Security Investigations (HSI) Laredo agents were contacted and notified of the above listed events.

HSI Laredo Special Agents (SAs) responded to the Border Patrol checkpoint to interview all subjects involved in the smuggling attempt.

CRAFT was read her Miranda Rights in the English language which CRAFT acknowledged and agreed to provide a statement without the presence of an attorney.

CRAFT was recruited a couple of weeks ago to smuggle UDAs by a person known only as "LOS". CRAFT stated she initially declined to transport UDAs, however, after negotiating, "LOS" paid CRAFT one-thousand (\$ 1,000.00) U.S. Dollars per UDA, up front, for the UDAs to be taken through the immigration checkpoint to Mile Marker 144 of IH 35.

On June 29, 2018, at approximately 5:45 A.M. CRAFT arrived at an agreed upon address. Shortly thereafter, a white Ford F150 parked in front of CRAFT's tractor, and unknown number of persons exited the Ford F150, entering the tractor through the passenger-side door, while CRAFT sat in the driver seat. A zip-lock bag with an unknown amount of money was given to CRAFT at that time by an unknown person. Craft stated the UDAs concealed themselves underneath blankets in the sleeper area of the cabin, and, after everyone was concealed CRAFT travelled onto IH 35 until reaching the United States Border Patrol Checkpoint.

HSI SAs interviewed Brazilian nationals Tiago PEREIRA-Silva and Washington NUNES-Andrade Filho whom are held as material witnesses in the case against CRAFT.

PEREIRA-Silva stated he made arrangements with an unknown human smuggler to be taken to Boston (Massachusetts) for a total of twenty-thousand (\$20,000.00) U.S. Dollars to be paid upon arriving in Boston.

NUNES-Andrade Filho stated his friend, Tiago PEREIRA-Silva, made arrangements with an unknown human smuggler to be taken to Boston for twenty-thousand (\$20,000.00) U.S. Dollars as well, to be paid upon reaching Boston.

Both PEREIRA-Silva, and NUNES-Andrade Filho identified CRAFT as the driver of the tractor-trailer via six (6) person photo-array.

A zip-lock bag containing ten-thousand (\$10,000.00) U.S. Dollars was seized by the United States Border Patrol which was handed over by CRAFT to BPAs.

**[END]**